



State Registration Number

B1798

Michigan Department of Environmental Quality
Air Quality Division

**RENEWABLE OPERATING PERMIT
STAFF REPORT**

ROP Number

MI-ROP-B1798-2008a

General Motors Corporation Warren Powertrain

SRN: B1798

Located at

23500 Mound Road, Warren, Michigan 48091

Permit Number: MI-ROP-B1798-2008

Staff Report Date: February 18, 2008

Amended Date: February 1, 2012

This Staff Report is published in accordance with Sections 5506 and 5511 of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Specifically, Rule 214(1) requires that the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), prepare a report that sets forth the factual basis for the terms and conditions of the Renewable Operating Permit (ROP).

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February 18, 2008 STAFF REPORT

Purpose

Major stationary sources of air pollutants, and some non-major sources, are required to obtain and operate in compliance with a ROP pursuant to Title V of the federal Clean Air Act of 1990 and Michigan's Administrative Rules for air pollution control pursuant to Section 5506(1) of Act 451. Sources subject to the ROP program are defined by criteria in Rule 211(1). The ROP is intended to simplify and clarify a stationary source's applicable requirements and compliance with them by consolidating all state and federal air quality requirements into one document.

This report, as required by Rule 214(1), sets forth the applicable requirements and factual basis for the draft permit terms and conditions including citations of the underlying applicable requirements, an explanation of any equivalent requirements included in the draft permit pursuant to Rule 212(5), and any determination made pursuant to Rule 213(6)(a)(ii) regarding requirements that are not applicable to the stationary source.

General Information

Stationary Source Mailing Address:	General Motors Corporation Warren Powertrain 23500 Mound Road Warren, Michigan 48091
Source Registration Number (SRN):	B1798
Standard Industrial Classification (SIC) Code:	3714
Number of Stationary Source Sections:	2
Is Application for a Renewal or Initial Issuance?	Renewal
Application Number:	200700042
Responsible Official:	Section 1 - Production Area: Ms.Carolyn Watts, Plant Manager - 586-497-3553 Section 2: Powerhouse and Wastewater Treatment: Mr. Thomas W. Neelands, Director of Energy and Utility Services - 248-753-4296
AQD Contact:	Mr. U. Sam Amer, Senior Environmental Engineer 586-753-3734
Date Permit Application Submitted:	April 4, 2007
Date Application Was Administratively Complete:	April 16, 2007
Is Application Shield In Effect?	Yes
Date Public Comment Begins:	February 18, 2008
Deadline for Public Comment:	March 19, 2008

Source Description

General Motors Corporation, Warren Powertrain is located in Macomb County at 23500 Mound Road, Warren, Michigan. The plant is principally engaged in production of automotive transmissions through metal machining and assembly activities. These processes are included in Section 1 of the Renewable Operating Permit (RO permit). Facility heat is provided exclusively by five on-site boilers, which are included in Section 2 of the RO permit.

The following table lists stationary source emission information as reported in Michigan Air Emissions Reporting System for **2006** submittal.

TOTAL STATIONARY SOURCE EMISSIONS

Pollutant	Tons per Year
Carbon Monoxide (CO)	14.7
Lead (Pb)	0
Nitrogen Oxides (NO _x)	40.6
Particulate Matter (PM)	3.5
Sulfur Dioxide (SO ₂)	10.6
Volatile Organic Compounds (VOCs)	1.2
Total Hazardous Air Pollutants (HAPs)	0

**As listed pursuant to Section 112(b) of the Clean Air Act.

See Parts C and D in the draft ROP for summary tables of all processes at the stationary source that are subject to process-specific emission limits or standards.

Regulatory Analysis

The following is a general description and history of the source. Any determinations of regulatory non-applicability for this source are addressed in the non-applicable requirement part of the Staff Report and Part E of the ROP.

The stationary source is located in Macomb County, which is currently designated as non-attainment for particulate matter 2.5.

As of June 15, 2004, Macomb County has been designated by the U.S. Environmental Protection Agency (USEPA) as a basic non-attainment area with respect to the 8-hour ozone standard.

The stationary source is subject to Title 40 Code of Federal Regulations, Part 70 because of potential emissions of NO_x and VOC being greater than 100 tons per year. The stationary source is subject to Prevention of Significant Deterioration of Title 40 of the Code of Federal Regulations, Part 52.21, regulations because its potential to emit of nitrogen oxides is greater than 100 tons per year, but not subject to R 336.1220 for Major Offset Sources.

The stationary source is not subject to the federal Compliance Assurance Monitoring rule under Title 40 of the Code of Federal Regulations, Part 64, because all emission units at the source either do not have a control device or those with a control device do not have potential pre-control emissions over the major source thresholds.

The RO permit is divided into 2 sections - Section 1: Production Area; and Section 2: Powerhouse and Wastewater Treatment.

Section 1 consists of two (2) emission units (EU) and three (3) Flexible Groups (FG). The emission units are: EU-CARPENTER: a maintenance carpenter shop; and EU-FUEL-TANK: a diesel fuel oil dispensing tank. The flexible groups are: FG-COLDCLEANERS; FG-RULE-287: a maintenance paint booths using no more than 200 gallons of coatings per month; and FG-RULE290: part washers. The cold cleaners do not use any of the halogenated solvents require by Maximum Achievable Control Technology (MACT) standards for halogenated solvent cleaner (40 CFR 63 Subpart T); therefore, they are not subject to the standards. The part washers and maintenance paint booths are exempt from Rule 336.1201 requirements pursuant to Rule 336.1290 and Rule 336.1287 respectively. Since there are applicable requirements associated with Rule 336.1290 and Rule 336.1287, the part washing operations and maintenance paint booths are included in the RO permit. The Carpenter shop and cutter grinding operation are subject to Rule 336.1331.

Section 2, includes a cogeneration unit and 5 boilers. The fuel oil fired boilers were built before 1963; therefore, they are not subject to any of the NSPS requirements. However, they are subject to Rule 401 requirement. The Cogeneration Unit is subject to New Source Performance Standards (NSPS) 40 CFR 60 Subpart GG.

Please refer to Parts B, C and D in the enclosed draft ROP for detailed regulatory citations for the stationary source. Part A contains regulatory citations for general conditions.

Source-wide Permit to Install (PTI)

Rule 214a requires the issuance of a Source-wide PTI within the ROP for conditions established pursuant to Rule 201. All terms and conditions that were initially established in a PTI are identified with a footnote designation in the integrated ROP/PTI document. PTIs that are being incorporated through this current permit action into the Source-wide PTI are listed in Appendix 6 of the permit.

The following table lists all individual PTIs that were incorporated into previous ROP/Source-wide PTIs and subsequently voided.

PTI Number	
823-90	26-84

Equivalent Requirements

This permit does not include any equivalent requirements or significant changes pursuant to Rule 212(5). Equivalent requirements are enforceable applicable requirements that are equivalent to the applicable requirements contained in the original New Source Review permit, a Consent Order/Judgment, and/or the State Implementation Plan.

Non-applicable Requirements

Part E of the draft ROP lists requirements that are not applicable to this source as determined by the AQD, if any were proposed in the application. These determinations are incorporated into the permit shield provision set forth in Part A (General Conditions 26 through 29) of the draft ROP pursuant to Rule 213(6)(a)(ii).

Processes in Application Not Identified in Draft ROP

The following table lists processes that were included in the ROP application as exempt devices under Rule 212(4). These processes are not subject to any process-specific emission limits or standards in any applicable requirement.

Exempt Emission Unit ID	Description of Exempt Emission Unit	ROP Exemption	NSR Permit Exemption
EU-CUTTERGRIND	Non-production unit and externally vented	R 212	R 285(l)(vi)(A)
EU-SPACEHEATERS	Various space heating units rated at less than 10 MMBtu/Hr	R 212(4)(b)	R 282(b)(i)
EU-FPI	Diesel fired engine rated at less than 10 MMBtu/Hr	R 212(4)(d)	R 285(q)
EU-GASSTRGDISP	Gasoline unloading, storage and dispensing operations	R 212(4)(c)	R 284(g)
EU-HCL-TANK	Hydrochloric acid storage tank – Dismantled as of 7/1/2004	NA	NA
EU-GAS-TANK	Gasoline dispensing tank rated at < 2,000 gal/day - Dismantled as of 7/13/2006	R 212(4)(c)	R 284(g)
EU-FUEL-TANK	Diesel fuel oil dispensing tank rated at < 2,000 gal/day - Dismantled as of 7/13/2006	R 212(4)(c)	R 284(g)
EU-AUTOPHORETIC	Autophoretic painting process – Dismantled as of 8/1/2004	NA	NA

Draft ROP Terms/Conditions Not Agreed to by Applicant

This permit does not contain any terms and/or conditions that the AQD and the applicant did not agree upon pursuant to Rule 214(2).

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements as of the effective date of this ROP.

Action taken by the DEQ

The AQD proposes to approve this permit. A final decision on the ROP will not be made until the public and affected states have had an opportunity to comment on the AQD's proposed action and draft permit. In addition, the U.S. Environmental Protection Agency (USEPA) is allowed up to 45 days to review the draft permit and related material. The AQD is not required to accept recommendations that are not based on applicable requirements. The delegated decision maker for the AQD is Teresa Seidel, Southeast Michigan District Supervisor. The final determination for ROP approval/disapproval will be based on the contents of the permit application, a judgment that the stationary source will be able to comply with applicable emission limits and other terms and conditions, and resolution of any objections by the USEPA.

Prepared by: U. Sam Amer / 1/31/08



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**March 26, 2008 STAFF REPORT
ADDENDUM**

Purpose

A Staff Report dated February 18, 2008, was developed in order to set forth the applicable requirements and factual basis for the draft Renewable Operating Permit (ROP) terms and conditions as required by R 336.1214(1). The purpose of this Staff Report Addendum is to summarize any significant comments received on the draft ROP during the 30-day public comment period as described in R 336.1214(3). In addition, this addendum describes any changes to the draft ROP resulting from these pertinent comments.

General Information

Responsible Official:	Section 1 - Production Area: Ms. Carolynne Watts, Plant Manager - 586-497-3553 Section 2: Powerhouse and Wastewater Treatment: Mr. Thomas W. Neelands, Director of Energy and Utility Services - 248-753-4296
AQD Contact:	Mr. U. Sam Amer, Senior Environmental Engineer 586-753-3734

Summary of Pertinent Comments

No pertinent comments were received during the 30-day public comment period.

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**February 1, 2012 STAFF REPORT FOR
RULE 216(1)(a)(i)-(iv) ADMINISTRATIVE
AMENDMENT**

Purpose

On February 1, 2012, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), approved and issued Renewable Operating Permit (ROP) No. MI-ROP-B1798-2008a to General Motors LLC – Warren Transmission Plant pursuant to R 336.1214. Once issued, a company is required to submit an application for changes to the ROP as described in R 336.1216. The purpose of this Staff Report is to describe the changes that were made to the ROP pursuant to R 336.1216(1)(a)(i-iv).

General Information

Responsible Official:	Ms. Doneen McDowell 586-497-3553
AQD Contact:	Kirsten S. Clemens, P.E., Environmental Engineer 269-567-3548
Application Number:	201200017
Date Application For Administrative Amendment Was Submitted:	November 2, 2009

Regulatory Analysis

The AQD has determined that the change requested by the stationary source meets the qualifications for an Administrative Amendment pursuant to R 336.1216(1)(a)(iv).

Description of Changes to the ROP

The name of the facility was changed to General Motors LLC – Warren Transmission Plant.

Compliance Status

The AQD finds that the stationary source is expected to be in compliance with all applicable requirements associated with the emission unit(s) involved with the change as of the date of approval of the Administrative Amendment to the ROP.

Action Taken by the DEQ

The AQD approved an Administrative Amendment to ROP No. MI-ROP-B1798-2008a, as requested by the stationary source. The delegated decision maker for the AQD is the District Supervisor.